

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules to)	CC Docket No. 94-102
Ensure Compatibility with Enhanced)	
911 Emergency Calling Systems)	
)	
Petition of City of Richardson, Texas)	

**COMMENTS OF NEXTEL COMMUNICATIONS, INC.
ON PETITIONS FOR RECONSIDERATION**

I. INTRODUCTION

Nextel Communications, Inc. ("Nextel") respectfully submits these Comments on the Petition for Expedited Reconsideration and Clarification of Sprint PCS ("Sprint") filed November 30, 2001 in the above-referenced proceeding.¹

In its Petition, Sprint provides practical, reasonable solutions for moving the Phase II Enhanced 911 ("E911") deployment process forward. The Petition presents the reality of the Phase II E911 deployment process – it is a three-pronged process of technical upgrades by the wireless carrier, the Public Safety Answering Point ("PSAP") and the Local Exchange Carrier ("LEC"). If any prong is not in place, Phase II E911 cannot be deployed. Therefore, as Sprint requests in its Petition, a valid PSAP request must include a showing of timely deployment of each prong prior to the end of the six-month PSAP request period. By reconsidering and refining its Order as requested by Sprint, the Commission can eliminate the significant confusion that continues to permeate the E911 deployment process, and thereby streamline Phase II E911 deployment efforts.

¹ Sprint PCS Petition for Expedited Reconsideration and Clarification, filed November 30, 2001, in CC Docket No. 94-102 ("Sprint Petition").

II. DISCUSSION

A. Validation of the ALI Database Upgrade

The Sprint Petition seeks reconsideration and clarification of certain aspects of the Commission's October 17, 2001 Order intended to define what is or is not a "valid" PSAP request for wireless E911 service. In the Order, the Commission concluded that a PSAP's request is valid if the PSAP can demonstrate (a) the existence of a funding mechanism, (b) that it has ordered the necessary CPE to receive and utilize the caller's location information, including a showing that the equipment will be delivered, installed and operable within six months; and (3) that it has made a timely request to the LEC for trunking, other facilities and Automatic Location Information ("ALI") database upgrades necessary for Phase II.

Nextel agrees with Sprint that the Commission's validity requirements are lacking in that they do not require any showing that the LEC-related upgrades, in particular the ALI database upgrades, will be completed and operable within the six-month time frame. As Sprint states in its Petition, there simply can be no Phase II E911 without specific upgrades to the ALI database that enable it to query carriers' Mobile Positioning Centers ("MPCs") for latitude and longitude data.² Thus, the Commission should require that "PSAPs [] document not only that the necessary CPE upgrades will be installed within six months, but also that necessary ALI database upgrades will be completed within six months."³ Both the CPE and the ALI database upgrades are critical to Phase II

² Sprint Petition at p. 6; *see also* Order at para. 17 ("...migration from an NCAS Phase I solution to Phase II requires an additional upgrade to the ALI database so that it will query the Mobile Positioning Center ("MPC") at the appropriate time to acquire the Phase II latitude/longitude data.")

³ Petition of Sprint at p. 6.

deployment, and both must be fully deployed before a carrier can launch Phase II services for its customers.

In a footnote to the Order, the Commission apparently assumes that ALI database upgrades will be completed within the six-month period, assuming a “timely” request, because one LEC’s tariff estimates lead-times of two to 16 days for interoffice trunking and customized routing.⁴ Given that Phase II E911 ALI database upgrades are new to the industry, are not among the items listed in the tariff referenced by the Commission, and are – more importantly – an essential component of successful Phase II E911 deployment, the Commission must ensure that the upgrades will occur in a timely manner before a PSAP request is considered “valid.” Nextel supports Sprint’s proposals to either (a) require PSAPs to provide an installation date for the ALI database upgrades on a PSAP-by-PSAP request basis or (b) require that LECs publish their planned timelines for updated Phase II-ready ALI databases. This would eliminate confusion and facilitate PSAP-LEC-wireless carrier cooperation because, under either approach, a PSAP request without a specific time period for the ALI database upgrade would not be prioritized among Nextel’s “valid” PSAP requests, while those PSAPs with a less-than-six-month time frame for ALI upgrades would get priority in Nextel’s Phase II deployment timeline.

B. Deploying the E2 Interface

As Nextel stated in its Reply Comments in this proceeding, effective and efficient Phase II E911 deployment can be best achieved when participants – LECs, PSAPs and carriers – deploy network infrastructure that conforms with the industry’s J-STD-036 E2

⁴ Order at fn. 29.

interface for the ALI database upgrade.⁵ Like Sprint, Nextel's Phase II network has been designed to accommodate the E2 interface. Thus, for each and every PSAP that chooses to use a different ALI database interface with Nextel's Gateway Mobile Location Center ("GMLC"),⁶ additional complications will result, including different technical specifications requiring significantly more planning and coordination with the PSAP and LEC, that will require additional time for full deployment.

Therefore, Nextel concurs with Sprint that, if the Commission is not going to require the use of the industry standard E2 interface, it should – at a minimum – provide carriers additional time to deploy non-standard or "one-off" PSAP interfaces. Refraining from "mandating" the standard, while also providing additional deployment time, carefully balances the needs of PSAPs to have flexibility in their deployment decisions with the needs of carriers, particularly national carriers such as Nextel, to deploy a consistent technical solution throughout its network.⁷

C. Tolling the Six-Month Request Period

Finally, in light of the Commission's decision to delineate between "valid" and "invalid" PSAP requests, the practical reality is that the Commission must agree to toll the six-month deployment time frame while carriers await evidence of the request's validity. If the Commission decides that the six-month clock is ticking while carriers await confirmation of the request's validity, then the Commission's distinction between a

⁵ Reply Comments of Nextel at p. 4.

⁶ The GMLC is the iDEN network's MPC.

⁷ In the Order, the Commission notes that the National Emergency Numbering Association ("NENA"), the Association of Public Safety Communications Officials ("APCO") and Tarrant County asserted that the E2 interface had not yet proven "useful" to all PSAPs, and as a result, not all PSAPs are prepared to use the standard interface. Sprint's proposal does not alter the PSAP's ability to deploy a non-standard interface,

valid and invalid request is a distinction without a difference. Because a PSAP could need three weeks to three or more months to provide evidence of its readiness, the Commission will undercut the value of its “validity” distinction if a carrier does not have six months to deploy after confirming that the PSAP is (or will be) ready. If the Commission does not toll the six-month clock during the time it takes a PSAP to validate its request, a carrier will be required to divert time, man-power and resources to a PSAP request the day it is received – whether valid or not – thus defeating the very public interest purpose for developing the “validity” criteria.

For these reasons, Nextel respectfully requests that the Commission toll the six month period for the time it takes a PSAP to validate its Phase II request to give carriers the full six months, provided by the Commission’s Rules, to deploy Phase II E911.

but it does recognize the reality of carving out niche PSAPs for different solutions – i.e., that additional time is needed to accommodate such requests.

III. CONCLUSION

As discussed herein, Nextel supports the Petition of Sprint, and asks that the Commission clarify and reconsider its Order.

Respectfully submitted,
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